

UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America

v.

Brandon James Williams,

Case No. 6:20-mj-00081-MK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ Lane _____ in the
 _____ District of _____ Oregon _____, the defendant(s) violated:

Code Section

18 U.S.C. § 2113(a) and 2(a)

Offense Description

Bank Robbery and aid and abet

This criminal complaint is based on these facts:

The attached affidavit of Isabe Scharn, which is incorporated herein

☒ Continued on the attached sheet.

/s/ Isabel Scharn, per Rule 4.1

Complainant's signature

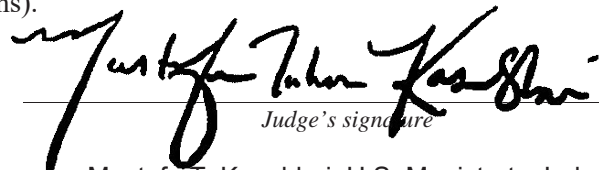
Isabel Scharn, Special Agent FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone
 at 12:42pm a.m./p.m. (specify reliable electronic means).

Date: April 10, 2020

City and state: Eugene, Oregon


Judge's signature

Mustafa T. Kasubhai, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss: AFFIDAVIT OF ISABEL SCHARN

Affidavit in Support of a Criminal Complaint and Summons

I, Isabel Scharn, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since August 2002. I am currently assigned to the Portland Division, Eugene Resident Agency. While employed by the FBI, I have investigated federal violations related to violent crimes, crimes against children, financial crimes, as well as a number of other criminal offenses. As a federal agent, I am authorized to seek and obtain search warrants, arrest warrants, and to investigate violations of federal law, including Title 18, United States Code, § 2113(a) Bank Robbery.

2. I submit this affidavit in support of a criminal complaint and summons for Brandon James Williams for bank robbery, in violation of 18 U.S.C. §§ 2113(a) and 2(a). As set forth below, there is probable cause to believe, and I do believe, that Brandon James Williams committed bank robbery, in violation of 18 U.S.C. §§ 2113(a) and 2(a).

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses, my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience.

Applicable Law

4. Title 18, United States Code, Section 2113(a), provides that whoever, by force and violence, or by intimidation, takes or attempts to take, from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, credit union, or any savings and loan association; or whoever enters or attempts to enter any bank, credit union, or any savings and loan association, or any building used in whole or in part as a bank, credit union, or as a savings and loan association, with intent to commit in such bank, credit union, or in such savings and loan association, or building, or part thereof, so used, any felony affecting such bank, credit union, or such savings and loan association and in violation of any statute of the United States, or any larceny—shall be fined under this title or imprisoned not more than twenty years, or both.

5. Title 18, United States Code, Section 2(a) states that whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission, is punishable as a principle.

Statement of Probable Cause

6. I have been investigating Brandon James Williams (hereinafter “Williams”), DOB XX/XX/1982, for violation of Title 18, United States Code, Section 2113, Bank Robbery. I have probable cause to believe, and do believe, that Williams committed the crime of bank robbery when he aided and abetted another individual in entering the Oregon Community Credit Union (OCCU) located at 2525 Coburg Rd., Eugene, Oregon, on October 21, 2019, who then demanded money from the teller and left with \$2,967.40.

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7. On October 21, 2019, at approximately 4:38PM, a woman walked into the Oregon Community Credit Union (“OCCU”) located at 2525 Coburg Rd., Eugene, Oregon 97401. She was wearing a dark grey or green beanie, purple sunglasses, black or dark grey v-neck long-sleeved shirt/sweater, black pants with light-colored flowers/circles, and dark black/tan shoes. She was carrying a black purse with what appeared to be silver handles and a black strap. She approached the victim teller and presented her with a note written on an 8.5”x 11” manila envelope. The note read something to the effect of, “hand over what’s in both drawers. No Dye packs, No funny money.” The teller told her that she only had one drawer and began placing the cash from her drawer on top of the manila envelope. The robber then grabbed the outside edges of the envelope and folded them over the cash, making it into a bundle. She then turned and left the bank through the front doors with the note/manila envelope. The teller stated that the robber gave her no reason to believe that she was armed with a weapon.

8. A later accounting by bank officials showed that the teller gave the robber \$2,967.40 and that the money contained no dye packs or other tracking devices.

9. OCCU was insured by the National Credit Union Administration on October 21, 2019, and at the times of the relevant conduct referenced above.

10. Officer J. Peckels with the Eugene Police Department obtained surveillance video from the Human Bean coffee shop located across the street from OCCU at 2809 Chad Drive. The surveillance video captured the southern side of the coffee shop, and showed a female subject walking from the general direction of the bank. The subject in this video was the exact same person captured on the OCCU video surveillance robbing the bank. The female subject in the video walked northbound across Chad Drive and down the western side of the Human Bean coffee shop. The suspect continued to walk north through the parking lot of 2809 Chad Drive

and towards the old Shopko building, then northwest toward Coburg Road before disappearing just outside the camera's view. The shadow of the suspect appears to get into a silver pick-up truck, which was seen driving in the Shopko parking lot.

11. Upon further review, the video obtained from the Human Bean coffee shop also showed the same pick-up truck enter the Shopko parking lot from the east and park just outside of camera's view in the northwest area of the lot. The shadow of the vehicle was still in the video, and it appears the female exited that vehicle and then walked southbound through the parking lot toward the credit union. The pick-up truck appeared to be a silver, later model Dodge Ram 1500 double cab with a truck bed cover and a white sticker affixed on the top passenger side corner of the rear windshield.

12. The still images of the bank robbery suspect and the pick-up truck were released to the public via social media channels by law enforcement.

13. On November 30, 2019, Corporal B. Lang with the Rifle Police Department in Rifle, Colorado, responded to a Violation of Protection Order. After a foot pursuit, a female, hereinafter referred to as the Cooperating Defendant ("CD"), was arrested on domestic violence charges. Crpl. Lang provided CD her Miranda rights and placed her in the rear of a patrol vehicle.

14. Crpl. Lang then made contact with the boyfriend, who was identified as Brandon James Williams. He was sitting in the driver's seat of his silver Dodge Ram 1500, bearing Colorado license plate CZM867. He was ultimately also arrested on domestic violence charges.

15. As Crpl. Lang prepared CD for transport to the Garfield County Jail, she began to break down and cry and stated several times that there was more than what Crpl. Lang knew.

16. Crpl. Lang interviewed CD. CD provided Crpl. Lang with information about her

relationship with the boyfriend and their involvement in a bank robbery. Crpl. Lang asked CD if Williams had been robbing banks and she stated, “has he been doing it more? He’s not the one that walked into the bank.” Crpl. Lang then asked CD which bank and she responded “he’s not the one that walked into the bank. My face, it’s my face. You know that’s me.” She stated the robbery was recently. Crpl. Lang then asked CD if Williams had her go into a bank and rob it and she nodded her head in an affirmative gesture.

17. CD told Crpl. Lang that the robbery did not take place in Rifle and that she wasn’t sure where. CD later advised that the bank robbery occurred after her last encounter with law enforcement on August 24, 2019. CD provided possible states where the bank robbery occurred as Utah, Nevada, Oregon, and Washington. CD told Crpl. Lang that the boyfriend was in his truck during the robbery and that he was her ride.

18. CD told Crpl. Lang that Williams wrote the note that she took in and gave to the teller. According to CD, Williams spent hours on research on his phone before the bank robbery and CD confirmed that Williams still had the same cell phone.

19. CD matched the description of the bank robber provided by the teller.

20. Crpl. Lang told me that CD is well known to him through previous law enforcement contacts. Crpl. Lang told me that he has been employed in Garfield County as a law enforcement officer since 2005. Specifically, from 2005 through 2018, Crpl. Lang was with the Garfield County Sheriff’s Office as a Deputy Sheriff where he was assigned to work in the detention division and on the patrol division, and from February 2018 to date with the Rifle Police Department where he is currently employed as a Patrol Corporal. From 2005 to date, he has had several law enforcement contacts with CD, including face-to-face conversations.

21. After his interview with CD, Crpl. Lang immediately conducted an online search

of the FBI's website and searched for information on recent unsolved bank robberies in the western states CD stated she had traveled through. The first results Crpl. Lang located were for a recent unsolved bank robbery that occurred in Oregon on October 21, 2019. Crpl. Lang reviewed the posted flyer and immediately observed three photos of a female suspect. After close inspection, Crpl. Lang told me that he believed the female in the photo to be CD based on his extensive professional contacts with CD.

22. A search of the FBI Bank Robbers database for Washington, Utah, Nevada, and Oregon, shows that the OCCU bank robbery in Oregon on October 21, 2019, is the only outstanding and unsolved robbery that includes a female subject.

23. Crpl. Lang also advised that he believes the vehicle pictured in the bank robbery photos are of Brandon Williams' silver Dodge Ram 1500 crew cab. Crpl. Lang noted the photo also showed a soft fabric bed cover, which was present on the truck. The first photograph is from surveillance footage on the day of the robbery, showing the truck from which I believe CD exited and returned. The second photograph was taken on November 30, 2019, and was the truck belonging to Williams.





24. I reviewed photos of CD, as well as photos of the silver Dodge Ram pick-up truck belonging to Williams. I believe CD is the female subject that robbed OCCU and that Williams' truck is the truck that CD is seen getting in and out of the day of the robbery.

25. On February 21, 2020, I interviewed CD regarding the robbery. CD provided information hoping to receive some benefit by cooperating with the government, but CD expressly understood that the government made no promise of any consideration at this time.

26. I have reviewed the CD's criminal history, which includes felony convictions, over the course of many years, for multiple counts of possession of a controlled substance, probation violations, protective order violations, Obstruction/Assault, displaying a false ID card, two misdemeanor theft charges, and driving offenses. The CD also has numerous arrests for various offenses, including arrests for failure to appear, assault, property crime, contempt of court for violating a protective order, drug charges, probation violations, trespassing, and violating a court order. The CD has been involved in the use of methamphetamine for years. CD is also now Williams' ex-girlfriend.

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27. CD confirmed that she and Williams committed the bank robbery at the OCCU on October 21, 2019. CD stated that a few weeks before the bank robbery in Eugene, Williams lost his job and decided to rob a bank. Williams and CD left Colorado in route to Oregon approximately four days before the bank robbery. They were in Williams' pick-up truck, a silver Dodge Ram 1500 crew cab, which CD also identified from the surveillance photos captured during the bank robbery. CD stated that she and Williams stayed at several motels, possibly three, and that Williams booked these motels using an online travel service, which he paid with a credit card. They stayed at a motel in or near Eugene the night before the bank robbery.

28. CD stated that, on the day of the bank robbery, Williams drove to an office supply store and bought an envelope to write the bank robbery note. After Williams wrote the note, they drove to OCCU and parked at the parking lot across from the bank because Williams thought there would be less risk of cameras. CD then called him via Facebook Messenger and stayed on an open call with him while she walked over and robbed the bank. CD was then shown surveillance photos that were captured immediately before and after the bank robbery. She positively identified herself, on the phone with Williams, on her way to and from the bank from the parking lot and coffee shop across the street from the bank. CD told me that Williams stayed in his truck and in the parking lot near the coffee shop while she robbed the bank. CD returned to Williams' truck and then put the envelope and the money on the console.

29. Grand Jury subpoenas were issued for the banking institutions associated with Williams' credit cards. Records show charges to Hotwire, an online travel booking site, on October 19, 20, and 23, as well as charges to Subway in Salem, Oregon, a Pizza Shop in Lincoln City, Oregon, and debit card transactions which resolved back to Eugene, Oregon, all occurring between October 19 and 23, 2019. IP Addresses related to the use of Williams' credit and debit

cards during that time frame also resolve back to Oregon and Washington.

30. A review of Williams' cell phone shows a message from Williams to another individual on October 18, 2019, stating, "I'm in Oregon bro." Emails contained on the phone also confirmed that Williams booked hotel rooms in Lake Oswego and Salem, Oregon, the days prior to the robbery, and booked hotel rooms in Renton, Washington, for the nights after the robbery.

Conclusion

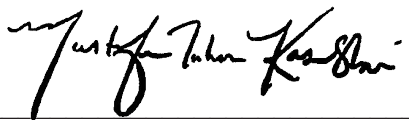
16. Based on the foregoing, I have probable cause to believe, and I do believe, that Brandon James Williams committed bank robbery in violation of Title 18 U.S.C. §§ 2113(a) and 2(a) at the Oregon Community Credit Union whose money was federally insured by the NCUA. I therefore request that the Court issue a criminal complaint and summons for Brandon James Williams.

17. Prior to being submitted to the Court, this affidavit and the accompanying application, were all reviewed by Assistant United States Attorney (AUSA) Gavin W. Bruce, and AUSA Bruce advised me that in his opinion the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and summons.

/s/ Isabel Scharn, per Rule 4.1

ISABEL SCHARN
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 12:42pm
a.m/p.m. on April 10, 2020.



MUSTAFA T. KASUBHAI
United States Magistrate Judge